UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Harris G. Griffin

Case No.: 19-12815-elf

Debtor

Chapter 13

MOTION TO APPROVE LOAN MODIFICATION

NOW INTO COURT COMES, Harris G. Griffin, hereinafter referred to as "Debtor", move this Honorable Court for an Order approving the loan modification with PennyMac Loan Services, LLC ("Mortgagee"), and avers the following:

- 1. On May 1, 2019, Debtor filed a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code.
 - 2. The Chapter 13 filing was assigned case number 19-12815.
 - 3. The Chapter 13 Plan was confirmed on October 29, 2019.
- 4. PennyMac Loan Services, LLC, the Mortgagee, has agreed to a permanent mortgage loan modification on the debtor's home known as and located at 4161 Stirling Street, Philadelphia, PA 19135. (Loan modification attached hereto and marked as "Exhibit A").
- 5. The acquiring of this loan modification is beneficial to all parties in this case in that it will allow the mortgagee to receive the necessary payments to complete the loan while allowing the Debtor to retain his property without facing further financial strain.
 - 6. The Chapter 13 Plan remains a pro-rata payback to unsecured creditors.

WHEREFORE, Debtor, in the above captioned Motion, prays that this Motion for Court approval of the loan modification is granted the above-stated reasons.

Dated: July 16, 2021

/s/Brad J. Sadek, Esq

Brad J. Sadek, Esq.

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